

51. Wire transfers originating from the Ellissa Exchange totaling approximately \$61,747,524 were sent to United States accounts for the purpose of purchasing or shipping cars between in or about January 2007 and in or about January 2011.

G. Transfers from Ayash, Ellissa and Others to the United States to Buy and Ship Used Cars

52. Between in or about January 2007 and in or about January 2011, the Ayash Exchange and the Ellissa Exchange originated approximately \$203,269,615 or more in wire transfers (the "Exchange Funds") from accounts held at LCB, Federal Bank, BLOM, and MEAB (collectively, the "Lebanese Banks") to bank accounts in the United States for the purchase or shipping of used cars.

53. Account holders other than Hassan Ayash Exchange and Ellissa Exchange initiated wire transfers totaling at least approximately \$126,281,969 (the "Non-Exchange Funds") to bank accounts in the United States for the purchase or shipping of used cars. Some of the originators for these Non-Exchange Funds are discussed below, see ¶ 77.

54. The following table summarizes the Exchange Funds and Non-Exchange Funds that were wired to the Lebanese Banks and then further wired to correspondent bank accounts in the United States, including in the Southern District of New York:

Bank	Exchange Funds	Non-Exchange Funds	Total
Lebanese Canadian Bank	\$170,848,679	\$59,024,274	\$229,872,953
BLOM Bank	\$27,717,176	\$65,468,173	\$93,185,349
Middle East and Africa Bank	\$1,913,625	\$1,506,477	\$3,420,102
Federal Bank of Lebanon	\$2,790,135	\$283,045	\$3,073,180
TOTAL	\$203,269,615	\$126,281,969	\$329,551,584

H. Cybamar Swiss Family of Companies

55. Between 2008 and 2010, used cars valued collectively at over \$1 billion were shipped from the United States to Benin, including hundreds of millions' worth of used cars purchased with funds from the Lebanese Banks.

56. Cybamar Swiss is a shipping company frequently used by the car buyers who received the Exchange Funds and Non-Exchange Funds transferred from the Lebanese Banks, as described above. Cybamar Swiss is headquartered in Redford, Michigan, with several locations worldwide, including Switzerland. STE Nomeco SARL, a Cybamar Swiss affiliate, owns and operates used car lots in Benin; STE Marco SARL, another Cybamar Swiss affiliate, is a transportation company operating between Togo and Ghana; and the Salhab Travel Agency operates in West Africa (collectively, with Cybamar Swiss, the "Cybamar Companies"). The Cybamar Companies are owned, operated, or controlled by Oussama Salhab, Fadi

Salhab, who resides in Michigan, and other members of the Salhab family.

57. During the Wire Transfer Period, approximately 195 wire transfers or more totaling approximately \$10,867,684 or more in United States currency were routed to account number 1852078466, held in the name of Cybamar Swiss GMBH LLC, at Comerica Bank, Detroit, Michigan, from the Hassan Ayash Exchange (approximately \$51,421), Oussama Salhab (approximately \$6,750,371); STE Marco SARL (approximately \$297,751); STE Nomeco SARL (approximately \$1,720,436); and Cross Continents Lines (Offshore) SAL (approximately \$1,087,628).

58. Additionally, during the Wire Transfer Period, approximately 13 wire transfers or more totaling approximately \$2,346,028 or more in United States currency were routed to account number 985914906, held in the name of Cybamar Swiss GMBH LLC, at PNC Bank, Pittsburgh, Pennsylvania, from the Hassan Ayash Exchange (approximately \$237,123); Oussama Salhab (approximately \$2,022,338); STE Nomeco SARL (approximately \$49,937); and Imad Zbib (approximately \$36,630).

59. Oussama Salhab was born in the Bekaa Valley, Lebanon and currently resides in Togo and Lebanon. Salhab is a Hizballah operative. On or about November 22, 2009, Salhab flew into the Detroit Metropolitan Airport on a flight from Beirut,

Lebanon. During an interview with a U.S. Customs and Border Protection ("CBP") officer, Salhab stated that he was traveling to the United States for business on behalf of Cybamar Swiss. He had on his person a business card identifying Salhab as the President of STE Marco SARL. During a border inspection of a fingerprint-encrypted laptop Salhab carried with him, CBP officers found, among other things, images of Hizballah Secretary General Hassan Nasrallah; audio of the Hizballah anthem; images of Hizballah militants stomping on an Israeli flag; and movie files of executions, hangings, torture, and beheadings. Salhab claimed that the images were placed on his computer by an employee, Houssam Mehana. Salhab was allowed to withdraw his application for admission into the United States, and departed the country. As described in more detail below, Oussama Salhab is heavily involved in the used car business in Benin and Togo and controls a network of money couriers who have transported millions of dollars in cash from West Africa to Lebanon, and who have traveled to the United States to transport cash and to purchase used cars for shipment to West Africa.

I. The Link Between U.S. Car Buyers and the Salhab West African Bulk Money Courier Network

60. In addition to hundreds of millions of dollars wired into the United States by LCB, the Hassan Ayash Exchange, and the Ellissa Group to buy used cars, money was also brought

into the United States by multiple individuals involved in the trade-based money laundering scheme. Some of these individuals transported cash, while other used pre-funded U.S. bank accounts created with money transferred from overseas. These individuals' entries into the United States were facilitated by other members of the conspiracy, particularly members of the Salhab family.

61. For example, on January 5, 2009, Mouhsen Ali Yassine, a Lebanese citizen residing in Togo, Africa, was stopped and interviewed by CBP officers while trying to enter the United States at Boston Logan International Airport. When questioned, Yassine acknowledged his and his family's membership in Hizballah. He carried with him a business card for the Salhab Travel Agency in Togo. The SIM card from his cellular telephone was discovered hidden in his shoe. He was determined to be inadmissible and processed for expedited removal.

62. Yassine, along with nine other Lebanese individuals, most of whom were from Togo, Africa, who attempted to enter the United States around the same time period all listed Fadi Salhab as their point of contact when applying for a non-immigrant visa to enter the United States.

63. Between approximately 2003 and 2011, at least 34 individuals who transported cash as couriers from Togo to Ghana (discussed further below, see ¶¶ 68-74) also applied for non-

immigrant visas for admission to the United States. Most identified their employment as car traders or car buyers, and some identified U.S. car buyers who received overseas wires from the Hassan Ayash Exchange, the Ellissa Exchange, and LCB as their points of contact while in the U.S., including five who identified Fadi Salhab as their point of contact.

J. Movement of Hundreds of Millions of Dollars from West Africa to Lebanon

64. At least hundreds of millions of dollars in U.S. currency are transported annually from Benin and other West African countries to Lebanon by money couriers, hawaladars, and currency brokers. These U.S. dollars include the proceeds of car sales from the Benin car parks, along with the proceeds of narcotics trafficking, money laundering proceeds, and other crimes. A significant portion of this money moves through courier and security networks controlled by Hizballah or individuals affiliated with Hizballah. The proceeds of the car sales help to conceal and disguise the true source, nature, ownership, and control of the narcotics proceeds.

65. Money couriers also transport millions of dollars from Benin on commercial air flights. Couriers travel on these flights and carry the undeclared cash with them in order to evade detection. For example, on December 9, 2010, three individuals who had traveled on a flight from Benin were arrested at Charles

De Gaulle International Airport in Paris, France. The three were en route to Beirut, Lebanon. They were discovered to be carrying over \$6.5 million in United States currency and €48,500. These funds were not declared. One of the individuals was carrying a business card for Ellissa Megastore, Ellissa's car lot in Cotonou, Benin.

66. Cash is also commonly transported out of Benin through the airport in Accra, Ghana, approximately 210 miles from Cotonou, Benin. The route from Cotonou to Accra passes through Togo and its capital, Lome, on the Ghana border. The Ghanaian Customs, Excise, and Preventive Services recorded approximately \$1.2 billion in declared United States currency imported across the Lome border crossing in 2007 and 2008. Approximately \$845 million of this was declared by Lebanese nationals.

67. From Accra, the cash is often flown to Beirut. Hizballah security facilitates the receipt of cash flown into the Beirut International Airport. For example, money couriers are sometimes instructed over the public address system to deplane first, and are escorted to private rooms in the airport where the cash would be received.

68. A network of couriers linked to Oussama Salhab, other members of the Salhab family, and related companies, together declared over \$97 million in U.S. currency couriered

over the Togo/Ghana border in 2007 and 2008, along with over €22,494,463.

69. Moreover, some of these same couriers applied for non-immigrant visas to enter the United States in order to purchase used cars, and listed a member of the Salhab family or other related individuals as their point of contact. See ¶ 63, supra.

70. Oussama Salhab and at least four other individuals provided a phone number for STE Marco SARL (the "STE Marco Phone Number") to Ghanaian authorities in connection with transporting currency across the Togo/Ghana border in 2007 and 2008. Together, Salhab and these four couriers declared a total of approximately \$7,922,950, along with approximately €2,667,600. At least 38 couriers, including Houssam Mehanna, provided either an office number or a mobile phone number for the Salhab Travel Agency to Ghanaian authorities in connection with transporting currency across the Togo/Ghana border in 2007 and 2008. These 38 couriers declared a total of approximately \$77,178,683, along with €16,013,808. Hassan Chokr (discussed further below), an associate of Maroun Saade and Oussama Salhab, declared a total of \$12,552,400, along with €3,813,055, that he transported across the Togo/Ghana in 2007 and 2008.

71. Oussama Salhab has offered free airline tickets from Ghana to Beirut, Lebanon, for individuals willing to courier bulk cash from West Africa to Lebanon.

72. Money couriers transporting cash across the Togo/Ghana border are sometimes detained and their cash loads seized by law enforcement if couriers attempt to smuggle the cash without declaring it or otherwise in violation of post-October 2008 restrictions on currency imports.⁵ Maroun Saade would pay bribes to release money couriers and others detained by law enforcement. For example, on March 15, 2009, Mehanna Houssam, Oussama Salhab's employee, was arrested by Togolese law enforcement. In exchange for a payment, Saade arranged for Houssam's release.

73. On July 21, 2010, Oussama Salhab and his employee Wissam Damen were stopped by Togolese law enforcement before driving across the Togo-Ghana border. Salhab and Damen had approximately \$798,150 and €311,910 in a concealed compartment in their car. Salhab advised Togolese law enforcement that he was part owner of a shipping company called Marco, the cash was from the sale of cars shipped to Togo, and he and Damen were transporting the cash to Ghana and then to Lebanon. Salhab paid

⁵ Effective October 20, 2008, currency with a value greater than \$10,000 could only be transferred through Ghana through a bank or other authorized dealer.

Maroun Saade for Saade to obtain Salhab's and Damen's release from custody.

74. As described above, in 2007 and 2008, Hassan Chokr transported approximately \$12,552,400 and €3,813,055, together with British pounds and Swiss francs, across the Togo/Ghana border. Chokr is a Hizballah weapons dealer who reports to senior Hizballah members in Lebanon. For example, Maroun Saade invited Chokr to Accra, Ghana, to attend a November 2010, meeting with three individuals working at the direction of the DEA as confidential sources ("CS-1," "CS-2," and "CS-3") with whom Saade was negotiating narcotics and arms deals. Chokr attended the meeting with his son-in-law, Alwar Pouryan, where they discussed supplying weapons to the CSs. Saade identified Chokr to CS-1 as being from Hizballah, and Pouryan as someone who sold weapons to Hizballah. Chokr has also described Pouryan as someone who supplied Hizballah with weapons when Hizballah could not procure them from other sources.

75. In an email Chokr sent to Pouryan in approximately November 2009, Chokr referred Pouryan to a certain money exchange house located in the United Arab Emirates and instructed Pouryan to reference "Mr Oussama Salhab (Hassan Exchange [sic] [C]ompany Lebanon)."

K. Used Car Buyers in the U.S. Receive Wire Transfers for Buying and Shipping Used Cars as Part of the Money Laundering Scheme

76. As described in more detail below, certain used car buyers in the United States (collectively the "Car Buyers") have received wire transfers from the Elissa Exchange and the Hassan Ayash Exchange via the Lebanese Banks for the purpose of buying and shipping used cars. The businesses of these Car Buyers typically have little or no property or assets other than bank accounts that are used to receive wires from overseas to buy cars, and to purchase used cars at auction. These cars are then transported to shipping ports, where they are shipped to West Africa. The Car Buyers typically do not have offices, car lots, or an inventory of used cars other than cars that are in transit to the ports. Some of the Car Buyers purchase cars for their own account, but others simply retain a fee of a few hundred dollars for each car that they buy.

77. The Car Buyers also received wire transfers for the purpose of buying and shipping used cars from other account holders at the Lebanese Banks ("Additional Transferors"), including the OFAC-designated Phenicia Shipping (Offshore); Ali Salhab and Yasmin Shipping & Trading; Fadi Star and its owners, Mohammad Hammoud and Fadi Hammoud; Fakih for General Trade, Khodor Fakih, and Ali Fakih; and Youssef Nehme.

a. In wire transfer instructions for wires from Phenecia Shipping (Offshore), a telephone number for the Ellissa Exchange is provided. From approximately January 2007 through early 2011, Phenecia Shipping wired approximately \$12,406,212 to the U.S. relating to buying and shipping cars.

b. In wire transfer instructions for wires from Yasmin Shipping & Trading, Ali Salhab's name appears next to Yasmin Shipping & Trading's. Ali Salhab is believed to be a relative of Ousamma Salhab's. From approximately January 2007 through early 2011, Ali Salhab and Yasmin Shipping & Trading wired approximately \$10,305,512 to the U.S. relating to buying and shipping cars.

c. Khodor Fakih is a Hizballah member from Kafra, Lebanon, who now works in the car business in Cotonou, Benin. Khodor Fakih and Ali Fakih are believed to own and control Fakih for General Trade. From approximately January 2007 through early 2011, Khodor Fakih, Ali Fakih, and Fakih for General Trade wired approximately \$2,589,325 to the U.S. relating to buying and shipping cars.

d. Fadi Hassan Hammoud and Mohammad Hassan Hammoud own and operate Fadi Star, a shipping company in Cotonou, Benin. Mohammad Hammoud is a Hizballah supporter from Kafra, Lebanon, and has done business with Khodor Fakih. From

approximately January 2007 through early 2011, Fadi Star, Mohammad Hassan Hammoud, and Fadi Hassan Hammoud wired approximately \$11,382,906 to the U.S. relating to buying and shipping cars.

e. Deeb Atieh is also a Hizballah member from Kafra, Lebanon. Deeb Atieh, Mohammad Deeb Atieh, and Fakhri Atieh are believed to own and control M/S Universal Motors. From approximately January 2007 through early 2011, the Atiehs and M/S Universal Motors wired approximately \$2,657,307 to the U.S. relating to buying and shipping cars.

f. Youssef Sobhi Nehme is a close associate of Ali Kharroubi and self-proclaimed supporter of Hizballah. From approximately January 2007 through early 2011, Nehme wired approximately \$21,832,344 to the U.S. relating to buying and shipping cars.

g. Mohamad Manana is believed to be a Hizballah member and an associate of Maroun Saade. From approximately January 2007 through early 2011, Mohamed Manana and Moustapha Manana wired approximately \$2,444,527 to the U.S. relating to buying and shipping cars.

78. The chart below sets forth Car Buyers, wire originators or initiators who sent transfers to these Car Buyers during the Wire Transfer Period, the number of wires sent by

those originators, and the total amount of such transfers. The chart includes only wire transfers for which records indicate a connection to the purchase, sale, shipment, or otherwise related transaction regarding used cars in the United States.

U.S. Car Buyer	Wire Originator	#	Amount
A & J Auto Sales Inc. Lansing, MI	Hassan Ayash Exchange	54	\$4,495,293
	Ellissa Exchange	6	\$374,454
	Yasmin Shipping & Trading	3	\$249,635
	Phenicia Shipping	2	\$57,961
	Others	128	\$5,571,301
Total:		193	\$10,748,644
Ace Auto Leasing Inc. Tulsa, OK	Hassan Ayash Exchange	4	\$418,641
	Mohamad Hassan Hammoud	42	\$5,101,035
	Fadi Hammoud	5	\$454,300
	Fadi Star	43	\$5,030,006
	Khodor Fakih	6	\$688,974
	Ali Fakih	4	\$289,704
	Fakih for General Trade	11	\$694,266
	Others	104	\$7,564,257
Total:		219	\$20,241,183
ARZ Export LLC Columbia, MD	Ellissa Exchange	4	\$215,446
	Ellissa Group	23	\$1,327,474
	Mohamad Hassan Hammoud	6	\$231,154
	Ali Kharoubi	1	\$84,968
	Others	9	\$298,005
Total:			\$2,157,047

U.S. Car Buyer	Wire Originator	#	Amount
Auto Care LLC d/b/a Golden Eagle Motors Vernon, CT	Hassan Ayash Exchange	15	\$887,012
	Mohamad Hassan Hammoud	1	\$16,945
	Others	20	\$1,194,151
Total:		44	\$2,206,078
Auto Rama Inc. Detroit, MI	Hassan Ayash Exchange	8	\$298,562
	Ellissa Exchange	2	\$142,828
	Ellissa Group	6	\$255,319
	Others	61	\$1,859,802
Total:		77	\$2,556,511
Baaklini North America Inc. Fairburn, GA	Oussama Salhab	8	\$629,427
	Others	28	\$846,705
Total:		36	\$1,476,132
Bassam G. Hanna d/b/a Cary Auto Sales Cary, NC	Hassan Ayash Exchange	1	\$49,880
	Others	2	\$122,882
Total:			\$172,672
Car UZD and Mid Overseas Inc. d/b/a Car UZD Miami, FL	Ellissa Exchange	6	\$478,810
	Jamal Kharoubi	20	\$2,079,597
	Ellissa Group	1	\$49,777
	Others	231	\$19,626,097
Total:		258	\$22,234,281
Cary Auto Sales Inc. Cary, NC	Hassan Ayash Exchange	7	\$419,299
	Others	105	\$3,669,314
Total:		112	\$4,088,613

U.S. Car Buyer	Wire Originator	#	Amount
Cedar Exports Auto Sales Mt. Juliet, TN	Hassan Ayash Exchange	13	\$1,196,346
	Ali Salhab	3	\$232,054
	Mohamad Hassan Hammoud	8	\$878,289
	Fadi Hammoud	2	\$199,600
	Fadi Star	2	\$199,745
	Others	98	\$3,673,303
Total:		126	\$6,379,337
Eagle Auto Sales Inc. Dearborn Heights, MI	Ellissa Exchange	1	\$41,855
	Mohamad Hassan Hammoud	31	\$2,794,220
	Others	24	\$1,164,698
Total:		56	\$4,000,773
Edya Export Import Inc. Holly Hill, FL	Hassan Ayash Exchange	14	\$1,145,540
	Oussama Salhab	17	\$1,679,051
	Others	17	\$317,145
Total:		48	\$3,141,736
EZ Auto Export LLC New Britain, CT	Ellissa Exchange	1	\$92,418
	Ali Salhab	5	\$194,341
	Yasmin Shipping & Trading	5	\$230,821
	Fadi Star	7	\$593,180
	Others	36	\$1,969,924
Total:		54	\$3,080,684

U.S. Car Buyer	Wire Originator	#	Amount
Ezedine Brothers LLC Hartford, CT	Hassan Ayash Exchange	9	\$444,080
	Ellissa Exchange	1	\$24,930
	Khodor Fakih	1	\$99,818
	Fadi Star	16	\$1,076,597
	Mohamad Hassan Hammoud	6	\$389,009
	Phenicia Shipping	1	\$31,808
	Ellissa Group	4	\$157,409
	Ali Salhab	1	\$49,923
	Yasmin Shipping & Trading	1	\$23,912
	Others	63	\$2,532,728
Total:		103	\$4,830,214
Global Auto LLC South Windsor, CT	Hassan Ayash Exchange	17	\$1,234,008
	Ellissa Exchange	1	\$34,918
	Ellissa Group	8	\$318,384
	Mohamad Hassan Hammoud	19	\$2,030,506
	Fadi Star	60	\$5,868,008
	Fadi Hammoud	5	\$393,400
	Oussama Salhab	1	\$74,943
	Ali Salhab	4	\$238,726
	Others	124	\$7,788,910
Total:		239	\$17,981,803

U.S. Car Buyer	Wire Originator	#	Amount
Global Shipping Services Detroit, MI	Hassan Ayash Exchange	36	\$4,315,811
	Ellissa Exchange	5	\$102,058
	Oussama Salhab	2	\$210,525
	STE Nomeco	10	\$400,359
	STE Marco	3	\$571,334
	Yasmin Shipping & Trading	2	\$120,208
	Mohamad Hassan Hammoud	2	\$138,379
	Fadi Star	7	\$521,435
	Youssef Nehme	1	\$32,253
	Imad Zbib	2	\$21,429
	Others	75	\$2,936,206
Total:		145	\$9,369,997
H & D Export, Import Inc. Detroit, MI	Ellissa Exchange	1	\$89,868
	Mohamad Manana	2	\$199,936
	Moustapha Manana	1	\$149,968
	Ellissa Group	1	\$199,600
	Others	42	\$3,602,571
Total:		47	\$4,241,943
HH Automotive Inc. Detroit, MI	Ellissa Exchange	1	\$204,700
	Youssef Nehme	5	\$708,688
	M/S Universal Motors Co.	2	\$89,815
	Deeb Atieh	2	\$139,815
	Others	8	\$271,161
Total:		18	\$1,414,179

U.S. Car Buyer	Wire Originator	#	Amount
Hijazi General Trading LLC Burtonsville, MD	Hassan Ayash Exchange	11	\$371,257
	Ellissa Exchange	6	\$181,561
	Oussama Salhab	3	\$215,563
	Ellissa Group	11	\$586,649
	Phenicia Shipping	2	\$38,130
	United Auto Enterprize	1	\$30,000
	Others	165	\$5,727,093
Total:		193	\$7,150,253
Jean Y. Chedid Trading Est d/b/a Jean Y. Chedid Dartmouth, MA	Hassan Ayash Exchange	2	\$199,680
	Ellissa Exchange	1	\$149,775
	Youssef Nehme	55	\$8,236,087
	Others	14	\$1,390,030
Total:		72	\$9,975,572
Kamal Al Khawand Dayton, OH	Ellissa Exchange	1	\$99,818
	Youssef Nehme	11	\$1,148,358
	Phenicia Shipping	6	\$599,124
	Others	19	\$722,196
Total:		54	\$3,355,982

U.S. Car Buyer	Wire Originator	#	Amount
Kassab Auto Dealer LLC North Arlington, NJ	Hassan Ayash Exchange	2	\$69,780
	Ellissa Exchange	1	\$30,968
	Mohamad Deeb Atieh	1	\$99,950
	Deeb Atieh	1	\$49,925
	Fadi Hammoud	1	\$99,850
	Mohamad Hassan Hammoud	7	\$424,353
	M/S Universal Motors	5	\$524,590
	Khodor Fakih	1	\$69,798
	Ali Mohamad Fakih	1	\$24,839
	M/S Fakih for General Trade	1	\$49,945
	Fadi Star	44	\$2,891,825
	Others	69	\$3,782,815
	Total:	150	\$9,116,281
Mansour Brothers Auto Trading Inc. Tampa, FL	Ellissa Group	7	\$543,880
	Youssef Nehme	3	\$299,441
	Mohamad Hassan Hammoud	1	\$99,786
	Others	29	\$2,300,780
	Total:	40	\$3,243,869

U.S. Car Buyer	Wire Originator	#	Amount
MGM Global Trading LLC South Windsor, CT	Hassan Ayash Exchange	51	\$5,826,171
	Ellissa Exchange	1	\$99,772
	Mohamad Hassan Hammoud	34	\$3,149,542
	Fadi Hammoud	4	\$344,525
	Fadi Star	75	\$6,906,387
	Ellissa Group	4	\$324,429
	M/S Fakih for General Trade	2	\$126,709
	Khodor Fakih	1	\$49,938
	Yasmin Shipping and Trading	2	\$349,508
	Ali Salhab	2	\$349,536
	Others	176	\$15,886,958
Total:		352	\$33,413,475
Myles Auto Sales New Bradford, MA	Hassan Ayash Exchange	2	\$149,569
	Ellissa Exchange	3	\$149,561
	Mohamad Deeb Atieh	1	\$200,000
	Ellissa Group	4	\$289,042
	Mohamad Hassan Hammoud	3	\$249,466
	Deeb Atieh	11	\$1,009,032
	M/S Universal Motors Co.	4	\$144,750
	Others	49	\$2,626,566
Total:		77	\$4,862,986
Poliproject Inc. d/b/a Fouad Autotrade St. Lawrence, MA	Hassan Ayash Exchange	48	\$8,931,410
	Mohamad Hassan Hammoud	16	\$2,165,885
	Others	27	\$4,750,986
Total:		91	\$15,848,281

U.S. Car Buyer	Wire Originator	#	Amount
Safari Enterprises LLC, Sahari Motors Orlando, FL	Hassan Ayash Exchange	24	\$1,279,431
	Ellissa Exchange	8	\$368,706
	Ellissa Group	2	\$37,102
	Ali Fakih	5	\$348,850
	Mohamad Hassan Hammoud	1	\$39,895
	Yasmin Shipping & Trading	2	\$99,741
	Fadi Star	7	\$346,297
	Ali Salhab	4	\$274,493
	Others	49	\$2,342,546
Total:		102	\$5,137,061
United Auto Enterprize Inc. Redford, MI	Hassan Ayash Exchange	2	\$249,880
	Oussama Salhab	17	\$1,518,022
	Cross Continents Lines SAL	1	\$49,972
	Yasmin Shipping & Trading	2	\$139,733
	Imad Zbib	1	\$48,805
	Mohamad Hassan Hammoud	2	\$55,737
	Bilal Hassan Salhab	1	\$27,000
	Others	8	\$307,194
Total:		34	\$2,396,343

U.S. Car Buyer	Wire Originator	#	Amount
United Quality Auto Sales Inc., Detroit, MI	Hassan Ayash Exchange	1	\$214,237
	Ellissa Exchange	5	\$664,103
	Youssef Nehme	31	\$5,661,437
	Ellissa Group	3	\$284,493
	Deeb Atieh	3	\$159,770
	M/S Universal Motors Co.	1	\$39,915
	Others	29	\$1,901,167
Total:		73	\$8,925,122
World Auto Sales LLC, Birmingham, AL	Hassan Ayash Exchange	2	\$99,715
	Ellissa Exchange	1	\$219,558
	Mohamad Hassan Hammoud	22	\$2,791,829
	Fadi Star	29	\$2,974,780
	Others	436	\$17,978,260
Total:		490	\$24,064,172
Aggregate:			\$247,822,334

V. CLAIMS FOR FORFEITURE

First Claim for Forfeiture -- Proceeds Traceable to Violations of IEEPA (18 U.S.C. § 981(a)(1)(c))

79. Paragraphs 1 through 78 of this Complaint are repeated and realleged as if fully set forth herein.

80. Title 18, United States Code, Section 981(a)(1)(C) subjects to forfeiture "[a]ny property, real or personal, which constitutes or is derived from proceeds traceable to a violation of . . . any offense constituting 'specified unlawful activity'

(as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense."

81. Under Section 1956(c)(7), the term "specified unlawful activity" includes, among other things, violations of "section 206 (relating to penalties) of the International Emergency Economic Powers Act [50 U.S.C. § 1705]." Section 1705 provides, in part, that "[i]t shall be unlawful for a person to violate, attempt to violate, conspire to violate, or cause a violation of any license, order, regulation, or prohibition issued under this title." 50 U.S.C. § 1705(a).

82. In addition, Title 18, United States Code, Section 984 provides in relevant part that:

(a)(1) In any forfeiture action in rem in which the subject property is cash, monetary instruments in bearer form, funds deposited in an account in a financial institution (as defined in section 20 of this title), or precious metals -

(A) it shall not be necessary for the Government to identify the specific property involved in the offense that is the basis for the forfeiture; and

(B) it shall not be a defense that the property involved in such an offense has been removed and replaced by identical property.

(2) Except as provided in subsection (b), any identical property found in the same place or account as the property involved in the offense that is the basis for the forfeiture shall be subject to forfeiture

under this section.

(b) No action pursuant to this section to forfeit property not traceable directly to the offense that is the basis for the forfeiture may be commenced more than 1 year from the date of the offense.

83. Because the Defendant Properties constitute or were derived from proceeds traceable to violations of executive orders and regulations issued pursuant to IEEPA (including Executive Order 13224), the Defendant Properties are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

**Second Claim for Forfeiture -- Property Involved In and Traceable
to Money Laundering Transactions
(18 U.S.C. § 981(a)(1)(A))**

84. Paragraphs 1 through 78 of this Complaint are repeated and realleged as if fully set forth herein.

85. Title 18, United States Code, Section 981(a)(1)(A) subjects to forfeiture "[a]ny property, real or personal, involved in a transaction or attempted transaction in violation of . . . section 1956 or 1957 of this title [relating to money laundering], or any property traceable to such property."

86. Title 18, United States Code, Section 1956(a) provides criminal penalties for:

(a)(1) [w]hoever knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts or attempts to conduct a financial transaction which in fact involves the proceeds of specified unlawful

activity -

(A) (i) with the intent to promote the carrying on of specified unlawful activity; or

. . . .

(B) knowing that the transaction is designed in whole or in part --

(i) to conceal or disguise the nature, the location, the source of ownership, or the control of the proceeds of specified unlawful activity; or

(ii) to avoid a transaction reporting requirement under State or Federal law

(2) Whoever transports, transmits, or transfers, or attempts to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States or to a place in the United States from or through a place outside the United States--

(A) with the intent to promote the carrying on of specified unlawful activity; or

(B) knowing that the monetary instrument or funds involved in the transportation represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, or transfer is designed in whole or in part--

(i) to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity; or

(ii) to avoid a transaction reporting requirement under State or Federal law.

87. In addition, Section 1956(h) provides, in part, that "[a]ny person who conspires to commit any offense defined in this section or section 1957 shall be subject to the same penalties as those prescribed for the offense the commission of which was the object of the conspiracy."

88. 18 U.S.C. § 1957 provides in relevant part that:

Whoever . . . knowingly engages or attempts to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 and is derived from specified unlawful activity, shall be punished as provided in subsection (b).

89. "Monetary transactions" is defined in 18 U.S.C. § 1957(f) (1) as the "deposit, withdrawal, transfer, or exchange, in or affecting interstate or foreign commerce of funds . . . by, through, or to a financial institution . . . including any transaction that would be a financial transaction under section 1956(c) (4) (B) of this title"

90. "Criminally derived property" is defined in 18 U.S.C. § 1957(f) (2) as "any property constituting, or derived from, proceeds obtained from a criminal offense."

91. "Specified unlawful activity" is defined in 18 U.S.C. § 1957(f) (3) as having the same meaning as that term has in 18 U.S.C. § 1956. As noted above, the term "specified

unlawful activity," as defined in Section 1956, includes violations of IEEPA.

92. The term "specified unlawful activity" further includes the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance or listed chemical (as defined in section 102 of the Controlled Substances Act), punishable under any law of the United States.

93. In addition, the term "financial transaction" is defined in 18 U.S.C. § 1956(c)(4), and includes "a transaction which in any way or degree affects interstate or foreign commerce (i) involving the movement of funds by wire or other means or (ii) involving one or more monetary instruments"

94. Because the Defendant Properties constitute properties involved in money laundering transactions and attempted money laundering transactions in violation of Sections 1956 and 1957, they are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A).

VI. CIVIL MONEY LAUNDERING PENALTIES

95. Paragraphs 1 through 78 of this Complaint are repeated and realleged as if fully set forth herein.

96. Pursuant to Title 18, United States Code, Section 1956(b), "[w]hoever conducts or attempts to conduct a transaction

described in subsection (a)(1) or (a)(3), or section 1957, or a transportation, transmission, or transfer described in subsection (a)(2), is liable to the United States for a civil penalty of not more than the greater of – (A) the value of the property, funds, or monetary instruments involved in the transaction; or (B) \$10,000.”


97. Accordingly, the Defendant Entities are liable to the Government for a sum of money representing the amount of property, funds, or monetary instruments involved in the money laundering offenses described above, in an amount that is no less than \$229,872,953 for LCB; \$141,522,091 for the Hassan Ayash Exchange Company; \$61,747,524 for Ellissa Holding, including the Ellissa Exchange; and an amount to be determined but not less than \$50,000,000 for the Cybamar Companies.

WHEREFORE, plaintiff United States of America prays that process issue to enforce the forfeiture of the Defendant Properties and that all persons having an interest in the Defendant Properties be cited to appear and show cause why the forfeiture should not be decreed, and that this Court decree forfeiture of the Defendant Properties to the United States of America for disposition according to law and that this Court grant plaintiff such further relief as this Court may deem just and proper together with costs and disbursements in this action.

Dated: New York, New York
December 15, 2011

PREET BHARARA
United States Attorney for the
Southern District of New York

By:

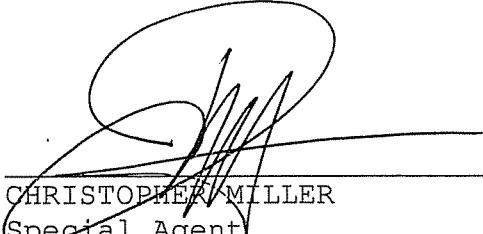

Sharon Cohen Levin
Michael D. Lockard
Jason H. Cowley
Alexander J. Wilson
Assistant United States Attorneys
One St. Andrew's Plaza
New York, New York 10007
(212) 637-1060/2193/2479/2453

VERIFICATION

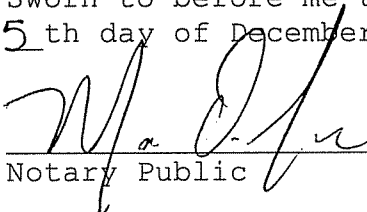
STATE OF NEW YORK)
COUNTY OF NEW YORK :
SOUTHERN DISTRICT OF NEW YORK)

CHRISTOPHER MILLER, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration ("DEA"); that he has read the foregoing amended complaint and knows the contents thereof; and that the same is true to the best of his knowledge, information and belief.

The sources of deponent's information and the grounds of his belief are his personal involvement in the investigation, and conversations with and documents prepared by law enforcement officers and others.


CHRISTOPHER MILLER
Special Agent
Drug Enforcement Administration

Sworn to before me this
15th day of December 2011


Notary Public

MARCO DASILVA
Notary Public, State of New York
No. 01DA6145603
Qualified in Nassau County
My Commission Expires May 8, 2014

SCHEDULE A

I. USED CAR BUYERS IN THE UNITED STATES AND THEIR ACCOUNTS

1. A & J Auto Sales Inc., Lansing, MI

Account:

- a. account number 1852318300, held in the name of A & J Auto Sales Inc., at Comerica Bank, Detroit, MI, and all funds traceable thereto;

2. Ace Auto Leasing Inc., Tulsa, OK

Account:

- a. account number 1021354, held in the name of Ace Auto Leasing Inc., at Security Bank, Tulsa, OK, and all funds traceable thereto;

3. ARZ Export LLC, Columbia, MD

Account:

- a. account number 003915682358, held in the name of ARZ Export LLC, at Bank of America NA, Richmond, VA, and all funds traceable thereto;

4. Auto Care LLC (d/b/a Golden Eagle Motors), Vernon, CT

Accounts:

- a. account number 003851460139, held in the name of Auto Care LLC (d/b/a Golden Eagle Motors), at Bank of America NA, Richmond, VA, and all funds traceable thereto;
- b. account number 100010418954, held in the name of Auto Care LLC (d/b/a Golden Eagle Motors), at Webster Bank NA, New Britain, CT, and all funds traceable thereto;

5. Auto Rama Inc., Detroit, MI

Accounts:

- a. account number D3640502130, held in the name of Auto Rama Inc., at RBS Citizens Bank NA, Riverside, RI, and all funds traceable thereto;

- b. account number D450559055, held in the name of Auto Rama Inc., at RBS Citizens Bank NA, Riverside, RI, and all funds traceable thereto;
- c. account number D3660794805, held in the name of Auto Rama Inc., at RBS Citizens Bank NA, Riverside, RI, and all funds traceable thereto;

6. Baaklini North America Inc., Fairburn, GA

Account:

- a. account number 334009142209, held in the name of Baaklini North America Inc., at Bank of America, Richmond, VA, and all funds traceable thereto;

7. Bassam G. Hanna d/b/a Cary Auto Sales, Cary, NC

Account:

- a. account number 0071124646, held in the name of Bassam G. Hanna d/b/a Cary Auto Sales, at Fidelity Bank, Fuquay Varina, NC, and all funds traceable thereto;

8. Car UZD and Mid Overseas Inc. (d/b/a Car UZD), Miami, Florida

Accounts:

- a. account number 005488236598, held in the name of Car UZD, at Bank of America, Richmond, VA, and all funds traceable thereto;
- b. account number 2000044100650, held in the name of Mid Overseas Inc. d/b/a Car UZD, at Wachovia Bank NA, Winston-Salem, NC;

9. Cary Auto Sale Inc., Cary, NC

Account:

- a. account number 200041752616, held in the name of Cary Auto Sale Inc., at Wachovia Bank, Winston-Salem, NC, and all funds traceable thereto;

10. Cedar Exports Auto Sales, Mt. Juliet, TN

Accounts:

- a. account number 003780099354, held in the name of Cedar Exports Auto Sales, at Bank of America NA, Richmond, VA, and all funds traceable thereto;
- b. account number 003780100146, held in the name of Cedar Exports Auto Sales, at Bank of America NA, Richmond, VA, and all funds traceable thereto;
- c. account number 151205758239, held in the name of Cedar Exports Auto Sales, at U.S. Bank National Association, St. Paul, MN, and all funds traceable thereto;
- d. account number 183725977, held in the name of Cedar Exports Auto Sales, at First Tennessee Bank, Memphis, TN, and all funds traceable thereto;
- e. account number 3006360, held in the name of Cedar Exports Auto Sales, at Reliant Bank, Brentwood, TN, and all funds traceable thereto;

11. Eagle Auto Sales Inc., Dearborn Heights, MI

Accounts:

- a. account number 5404311333, held in the name of Eagle Auto Sales Inc., at Bank of America NA (formerly LaSalle Bank), Henrico, VA, and all funds traceable thereto;
- b. account number 5404706474, held in the name of Eagle Auto Sales Inc., at Bank of America NA (formerly LaSalle Bank), Henrico, VA, and all funds traceable thereto;

12. Edya Export Import Inc., Holly Hill, FL

Account:

- a. account number 0010200496580, held in the name of Edya Export Import Inc., at Bank of America NA, Richmond, VA, and all funds traceable thereto;

13. EZ Auto Export LLC, New Britain, CT

Account:

- a. account number 385005031155, held in the name of EZ Auto Export LLC, at Bank of America NA, Richmond, VA, and all funds traceable thereto;

14. Ezedine Brothers LLC, Hartford, CT

Accounts:

- a. account number 6500023951, held in the name of Ezedine Brothers LLC, at People's United Bank, Hartford, CT, and all funds traceable thereto;
- b. account number 7000380666, held in the name of Ezedine Brothers LLC, at First Niagara Bank NA, Lockport, NY, and all funds traceable thereto;
- c. account number 9501914077, held in the name of Ezedine Brothers LLC, at First Niagara Bank NA, Lockport, NY, and all funds traceable thereto;
- d. account number 1000010094950, held in the name of Ezedine Brothers LLC, at Webster Bank NA, New Britain, CT, and all funds traceable thereto;
- e. account number 7070205177, held in the name of Ezedine Brothers LLC, at First Niagara Bank NA, Lockport, NY, and all funds traceable thereto;
- f. account number 9500946008, held in the name of Ezedine Brothers LLC, at First Niagara Bank NA, Lockport, NY, and all funds traceable thereto;

15. Global Auto LLC, South Windsor, CT

Account:

- a. account number 100010497762, held in the name of Global Auto LLC, at Webster Bank NA, New Britain, CT, and all funds traceable thereto;
- b. account number 385000239567, held in the name of Global Auto LLC, at Bank of America NA, Richmond, VA, and all

funds traceable thereto;

16. Global Shipping Services, Detroit, MI

Account:

- a. account number 1851738532, held in the name of Global Shipping Services, at Comerica Bank, Detroit, MI, and all funds traceable thereto;

17. H & D Export and Import Inc., Detroit, MI

Account:

- a. account number 4506043277, held in the name of H & D Export and Import Inc., at RBS Citizens NA, Riverside, RI, and all funds traceable thereto;

18. HH Automotive Inc., Detroit, MI

Accounts:

- a. account number 7913961236, held in the name of HH Automotive Inc., at Fifth Third Bank, Cincinnati, OH, and all funds traceable thereto;
- b. account number 771360245, held in the name of HH Automotive Inc., at JPMorgan Chase Bank, Tampa, FL, and all funds traceable thereto;

19. Hijazi General Trading LLC, Burtonsville, MD

Account:

- a. account number 1461670301, held in the name of Hijazi General Trading LLC, at Sandy Spring National Bank, Columbia, MD, and all funds traceable thereto;

20. Jean Y. Chedid Trading Est d/b/a Jean Y. Chedid, Dartmouth, MA

Accounts:

- a. account number 004601044225, held in the name of Jean Y. Chedid Trading Est. d/b/a Jean Y. Chedid, at Bank of America NA, Richmond, VA, and all funds traceable

thereto;

- b. account number 22071326, held in the name of Jean Y. Chedid Trading Est. d/b/a Jean Y. Chedid, at RBS Citizens Bank, Riverside, RI, and all funds traceable thereto;

21. Kamal Al Khawand, Dayton, OH

Account:

- a. account number 415006924, held in the name of Kamal Al Khawand, at Liberty Savings Bank, Wilmington, OH, and all funds traceable thereto;

22. Kassab Auto Dealer LLC, North Arlington, NJ

Accounts:

- a. account number 381005084630, held in the name of Kassab Auto Dealer LLC, at Bank of America NA, Richmond, VA, and all funds traceable thereto;
- b. account number 4245299816, held in the name of Kassab Auto Dealer LLC, at TD Bank NA, Lewiston, ME, and all funds traceable thereto;

23. Mansour Brothers Auto Trading Inc., Tampa, FL

Account:

- a. account number 8042546625, held in the name of Mansour Brothers Auto Trading Inc., at BB&T Bank, Wilson, NC, and all funds traceable thereto;
- b. account number 8048989720, held in the name of Mansour Brothers Auto Trading Inc., Tampa, FL;

24. MGM Global Trading LLC, South Windsor, CT

Accounts:

- a. account number 100010497742, held in the name of MGM Global Trading LLC, at Webster Bank NA, New Britain, CT, and all funds traceable thereto;

- b. account number 385002807418, held in the name of MGM Global Trading LLC, at Bank of America NA, Richmond, VA, and all funds traceable thereto;
- c. account number 385002807421, held in the name of MGM Global Trading LLC, at Bank of America NA, Richmond, VA, and all funds traceable thereto;
- d. account number 7070181080, held in the name of MGM Global Trading LLC, at First Niagara Bank NA, Lockport, NY, and all funds traceable thereto;
- e. account number 51304962536, held in the name of MGM Global Trading LLC, at Sovereign Bank, Reading, PA, and all funds traceable thereto;

25. Myles Auto Sales, New Bradford, MA

Accounts:

- a. account number 68500026114, held in the name of Myles Auto Sales, at Sovereign Bank, Reading, PA, and all funds traceable thereto;
- b. account number 9496873999, held in the name of Myles Auto Sales, at Bank of America NA, Richmond, VA, and all funds traceable thereto;

26. Poliproject Inc. d/b/a Fouad Autotrade, St. Lawrence, MA

Account:

- a. account number 8245243071, held in the name of Poliproject Inc. d/b/a Fouad Autotrade, at TD Bank NA, Lewiston, ME, and all funds traceable thereto;

27. Safari Enterprises LLC, Orlando, FL & Sahari Motors, Orlando, FL

Accounts:

- a. account number 100010323810, held in the name of Safari Enterprises LLC, at Webster Bank NA, New Britain, CT, and all funds traceable thereto;

- b. account number 2000036107470, held in the name of Safari Enterprises LLC, at Wachovia Bank NA, Winston-Salem, NC, and all funds traceable thereto;
 - c. account number 200051058944, held in the name of Sahari Motors, at Wachovia Bank NA, Winston-Salem, NC, and all funds traceable thereto;
28. United Auto Enterprize Inc., Redford, MI

Accounts:

- a. account number 1852550415, held in the name of United Auto Enterprize Inc., at Comerica Bank, Detroit, MI, and all funds traceable thereto;
 - b. account number 229034804888, held in the name of United Auto Enterprize Inc., at Bank of America NA, Richmond, VA, and all funds traceable thereto;
29. United Quality Auto Sales Inc., Detroit, MI

Account:

- a. account number 1851548741, held in the name of United Quality Auto Sales Inc., at Comerica Bank, Detroit, MI, and all funds traceable thereto;
30. World Auto Sales LL, Birmingham, AL

Account:

- a. account number 0028860, held in the name of World Auto Sales LLC, at Iberia Bank, Lafayette, LA, and all funds traceable thereto.

II. CYBAMAR SWISS ENTITITES AND THEIR ACCOUNTS

1. Cybamar Swiss GMBH LLC

Accounts:

- a. account number 1852078466, held in the name of Cybamar Swiss GMBH LLC, at Comerica Bank, Detroit, MI, and all funds traceable thereto;

- b. account number 985914906, held in the name of Cybamar Swiss GMBH LLC, at PNC Bank, Pittsburgh, PA, and all funds traceable thereto.
- c. account number 177717592000, held in the name of Cybamar Swiss GMBH LLC, at Credit Suisse AG, and all funds traceable thereto.
- d. account number 076705931001, held in the name of Cybamar Swiss GMBH LLC, at Credit Suisse AG, and all funds traceable thereto.
- e. account number 076705932000, held in the name of Cybamar Swiss GMBH LLC, at Credit Suisse AG, and all funds traceable thereto.